



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
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September 10, 2012

Mr. Frank Finneran
Seattle Hilton
1301 6th Avenue
Seattle, WA 98101

**Re: Opinion Pursuant to WAC 173-340-515(5) on Proposed Remedial Action for the
Following Hazardous Waste Site:**

- Name: Seattle Hilton Hotel
- Address: 1301 6th Avenue, Seattle, WA
- Facility/Site No.: 56642815
- VCP No.: NW2491

Dear Mr. Finneran:

Thank you for submitting documents regarding your proposed remedial action for the Seattle Hilton Hotel (Site) for review by the Washington State Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding a review of submitted documents/reports pursuant to requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Site:

- Gasoline-range petroleum hydrocarbons (TPHg), Benzene, Toluene, Ethyl Benzene, Xylene (BTEX), and lead in ground water.
- Gasoline-range petroleum hydrocarbons (TPHg), Benzene, Toluene, Ethyl Benzene, Xylene (BTEX), and lead in soil.

Ecology is providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).



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This opinion does not resolve a person's liability to the state under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The state does not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology.

Ecology's Toxics Cleanup Program has reviewed the following information regarding your proposed remedial action(s):

1. Proposed Groundwater cleanup action, Hilton Seattle Hotel, Seattle, Washington, cleanup site ID #436. Prepared by Shannon and Wilson, dated July 18, 2012.
2. Periodic Review, Hilton Hotel Parking Garage Facility ID# 56642815. Prepared by Washington Department of Ecology, dated February 2010.

The reports listed above will be kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Appointments can be made by calling the NWRO resource contact at (425) 649-7235.

The Site is defined by the extent of contamination caused by the following release(s):

- Gasoline-range petroleum hydrocarbons (TPHg), Benzene, Toluene, Ethyl Benzene, Xylene (BTEX), and lead in ground water.
- Gasoline-range petroleum hydrocarbons (TPHg), Benzene, Toluene, Ethyl Benzene, Xylene (BTEX), and lead in soil.

The Site is more particularly described in Enclosure A to this letter, which includes a detailed Site diagram. The description of the Site is based solely on the information contained in the documents listed above.

Based on a review of supporting documentation listed above, pursuant to **requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Site, Ecology has determined:**

- Ecology has deemed that quarterly sampling from the four monitoring wells, continued recovery of gasoline in ground water and oxidation to enhance petroleum degradations, as defined in the "Proposed Groundwater Cleanup Action" dated July 18, 2012, is an appropriate action for this Site.
- Submit to Ecology, ground water elevation, depth-to-water, TPHg, lead, and BTEX concentrations data collected at each of the observation wells.

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- Provide gasoline volume removed in each quarterly progress reports.

This opinion does not represent a determination by Ecology that a proposed remedial action will be sufficient to characterize and address the specified contamination at the Site or that no further remedial action will be required at the Site upon completion of the proposed remedial action. To obtain either of these opinions, you must submit appropriate documentation to Ecology and request such an opinion under the VCP. **This letter also does not provide an opinion regarding the sufficiency of any other remedial action proposed for or conducted at the Site.**

Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

The state, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in providing this opinion.

Again, Ecology appreciates your initiative in conducting independent remedial action and requesting technical consultation under the VCP. As the cleanup of the Site progresses, you may request additional consultative services under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed for or conducted at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at (425) 649-7191.

Sincerely,

Eugene Freeman
Site Manager
Toxics Cleanup Program

Enclosure: Site Description

cc: Mark Bryant, Shannon and Wilson
Sonia Fernandez, VCP Coordinator, Ecology

Site Description

Site Description

The property is located in the central business district of Seattle, at the corner of University Street and 6th Avenue. Contamination is believed to be gasoline-range hydrocarbons from an underground storage tank located in the lower garage of the Seattle Hilton Hotel.

Area/Property Description

The property is located in the downtown Seattle business district between 5th and 6th Avenues and University and Union Streets. The property is identified by King County as Parcel Number 197570-0040.

Property History and Current Use

Prior to construction of the Seattle Hilton Hotel, the site was occupied by a Union 76 gasoline station. One of two tanks installed during construction of the hotel developed a leak two years into service and was repaired or replaced. The tanks were closed in place in 1985 or early 1986 by filling with cement slurry. The Site continues to be operated by the Seattle Hilton.

Contaminant Source and History

Prior to construction of the hotel, the property was host to a Union 76 gasoline station. During construction two underground storage tanks were installed along the east boundary of the property. Two years into service, one of the tanks developed a leak. The tank was repaired or replaced. In 1985 both tanks were closed in place. In the 1990's, gasoline odors were detected during excavation of an elevator shaft.

Physiographic Setting

The Property is located in the Central Business District physiographic region of the Seattle Drift Plain. The property is located on a west facing slope, approximately 100 feet above mean sea level.

Ecological Setting

The property is located in downtown Seattle. The surrounding area is occupied by office buildings and commercial businesses. There is no open, undeveloped land and habitat within 500 feet of the property.

Geology

Sediment at the Site in descending order is, fill material of variable thickness followed by a silty sand/sandy silt layer. A dense clay/silt layer 3 to 15 feet thick underlies the silty sand and beneath that is very dense silt to fine sand layer.

Groundwater

Groundwater is located in the lower dense silt and fine sand at an arbitrary elevation of about 77 feet, with surface elevation at about 108 feet. Flow is to the west with a gradient of 0.026 feet/foot.

Surface Water

Puget Sound is approximately 0.5 miles to the west of the Property. Runoff from the Property is collected by City of Seattle storm drains.

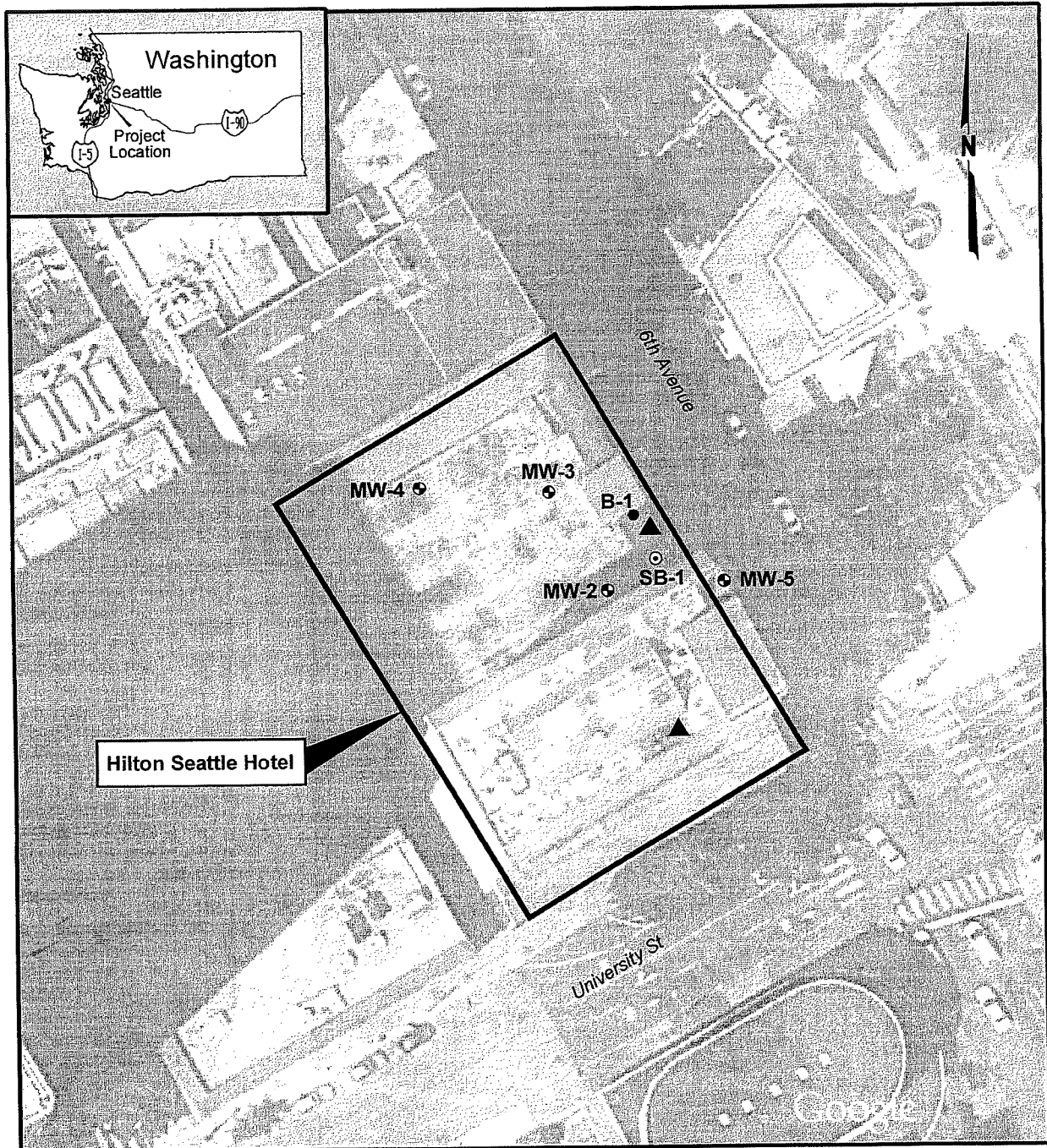
Release and Extent of Contamination – Soil

Contamination was released from at least one of the underground storage tanks operated by the Hilton Hotel. The tank was repaired or replaced and both tanks at the property were later closed in place. The quantity of residual gasoline in the soil is unknown.

Extent of Contamination – Groundwater

Highest concentration of TPH and benzene is at the ground water monitoring well to the east of the tanks, upgradient for ground water flow. It is speculated that gasoline may migrate along the silt layer above the water table and then infiltrate upgradient near the east well (MW-5). In the most current sample collected at this Site, TPH and benzene are now present in two down gradient wells (MW-2 and MW-3) at concentrations above MTCA Method A cleanup levels.

Filename: J:\21112341-004\21-1-12341-004 Fig 1.dwg Date: 07-11-2012 Login: bac



LEGEND

- Approximate Parcel Boundary
- MW-2 Monitoring Well Designation and Approximate Location (Shannon & Wilson, 1998)
- SB-1 Boring Designation and Approximate Location (Shannon & Wilson, 1998)
- B-1 Boring Designation and Approximate Location (Environmental Associates, Inc., 1994)
- ▲ Approximate Historical Location of Underground Storage Tank (UST)

NOTE

Parcels adapted from "kcproperty_mapper2101634819006.pdf" downloaded 7-22-11 from <http://www5.kingcounty.gov>. Aerial imagery provided by Google Earth Pro, reproduced by permission granted by Google Earth™ Mapping Service.

Hilton Seattle Hotel
Seattle, Washington

SITE AND EXPLORATION PLAN

July 2012

21-1-12341-004

SHANNON & WILSON, INC.
Geotechnical and Environmental Consultants

FIG. 1

